

TFH
BAM/EGW: USAO 2022R00196

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

TIANNA COSBY,
a/k/a "MENDOZA,"
MARCHE SISCO,
TOMMI COSBY,
BINIAH CARTER, and
ZION OLUWADEMILADE
ADEDUWON,

Defendants

CRIMINAL NO. 23-cr-00442 PJM.

(Conspiracy to Commit Mail Fraud
and Bank Fraud, 18 U.S.C. § 1349;
Bank Fraud, 18 U.S.C. § 1344;
Aggravated Identity Theft,
18 U.S.C. § 1028A; Aiding and
Abetting, 18 U.S.C. § 2; Forfeiture,
18 U.S.C. §§ 981(a)(1)(C),
21 U.S.C. § 853(p), 28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

(Conspiracy to Commit Mail Fraud and Bank Fraud)

The Grand Jury for the District of Maryland charges that:

Introduction

At all times relevant to this Indictment:

1. Defendants TIANNA COSBY, a/k/a "Mendoza," MARCHE SISCO ("SISCO"), TOMMI COSBY, BINIAH CARTER ("CARTER"), and ZION OLUWADEMILADE ADEDUWON ("ADEDUWON") were residents of Maryland.

2. SISCO was a mail handler assistant for the United States Postal Service ("USPS") at the Washington Network Distribution Center ("NDC") located in Capitol Heights, Maryland. The NDC was a USPS facility responsible for sorting and distributing mail from across the United States.

USDC - GREENBELT
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3. BB&T Bank, Wells Fargo Bank, and Navy Federal Credit Union were financial institutions as defined in 18 U.S.C. § 20 (hereinafter, the “financial institutions”), and had physical branches, Automatic Teller Machines (“ATM”), teller windows, and employees in Maryland and elsewhere.

4. An “account mule” was an individual whose bank account was used to deposit illegally acquired checks and proceeds.

5. “Means of identification” was any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual, including any name, social security number, date of birth, government issued identification number, bank account number, and bank personal identification number.

The Conspiracy and Its Objects

6. From a time unknown to the Grand Jury, but beginning at least in or about March 2021, and continuing through at least in or about August 2021, in the District of Maryland and elsewhere, the defendants,

**TIANNA COSBY,
a/k/a “Mendoza”
MARCHE SISCO,
TOMMI COSBY,
BINIAH CARTER, and
ZION OLUWADEMILADE ADEDUWON,**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury:

a. to commit mail fraud, that is, to devise and intend to devise a scheme and artifice to defraud, and to obtain money by means of materially false and fraudulent pretenses, representations, promises, and material omissions (the “scheme to defraud”), and, for the purpose

of executing and attempting to execute the scheme to defraud, to take and receive any matter and thing whatever to be sent or delivered by the USPS, in violation of 18 U.S.C. § 1341; and

b. to commit bank fraud, that is, to execute and attempt to execute a scheme and artifice to defraud the victim financial institutions, and to obtain and attempt to obtain monies, funds, credits, assets, and securities owned by and under the custody and control of the victim financial institutions by means of materially false and fraudulent pretenses, representations, and promises, in violation of 18 U.S.C. § 1344.

Manner and Means of the Conspiracy and Scheme to Defraud

It was part of the conspiracy and scheme to defraud that:

7. **TIANNA COSBY, SISCO**, and others known and unknown to the Grand Jury stole, took, removed, and caused the theft of, personal and business checks belonging to victims that had been mailed via the USPS through various means.

8. **TIANNA COSBY** stole, took, and removed, and caused the theft of, personal and business checks belonging to victims from USPS collection boxes.

9. **SISCO** used her position as a mail handler assistant at the NDC to steal, take, remove, and cause the theft of, personal and business checks belonging to victims from the NDC.

10. **TIANNA COSBY** and **SISCO** communicated regarding the sale, distribution, and purchase of over 600 stolen checks, with a face value of over \$5 million.

11. **TIANNA COSBY** made, and caused to be made, arrangements for herself and others known and unknown to the Grand Jury to obtain, procure, and collect checks from **SISCO**.

12. **TIANNA COSBY, TOMMI COSBY, CARTER**, and **ADEDUWON** recruited and caused the recruitment of account mules.

13. **TIANNA COSBY, TOMMI COSBY, CARTER, and ADEDUWON** collected, and caused the collection of, banking information and the means of identification belonging to account mules.

14. **TIANNA COSBY, TOMMI COSBY, CARTER, and ADEDUWON** transferred and exchanged the banking information and the means of identification belonging to account mules, including, without limitation, Account Mule #1 and Account Mule #2.

15. **TIANNA COSBY, SISCO, TOMMI COSBY, CARTER, and ADEDUWON** used, transferred, and possessed the means of identification belonging to identity theft victims, including, without limitation, Identity Theft Victims #1 through #5.

16. **TIANNA COSBY, TOMMI COSBY, CARTER, and ADEDUWON** altered, and caused to be altered, personal checks to reflect payment to account mules.

17. **TIANNA COSBY, TOMMI COSBY, CARTER, and ADEDUWON** altered, and caused to be altered, business checks to reflect payment to account mules.

18. **TIANNA COSBY, SISCO, TOMMI COSBY, CARTER, and ADEDUWON** deposited and caused the deposit of altered and fraudulent checks into bank accounts belonging to account mules at financial institutions.

19. **TIANNA COSBY, TOMMI COSBY, CARTER, and ADEDUWON** obtained, and caused to be obtained, the proceeds from altered and fraudulent checks by engaging in various monetary transactions to withdraw the proceeds, by way of, without limitation, ATM withdrawals and peer-to-peer financial transfers.

18 U.S.C. § 1349

COUNTS TWO THROUGH ELEVEN
(Bank Fraud)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 5 and 7 through 19 of Count One of this Indictment are incorporated here and constituted a scheme and artifice to defraud the victim financial institutions, and to obtain money and property from the victim financial institutions, by means of materially false and fraudulent pretenses, representations, and promises and material omissions (“the scheme to defraud”).

2. On or about the dates set forth below, in the District of Maryland and elsewhere, the defendant(s) listed below knowingly executed, and attempted to execute, a scheme and artifice to defraud the victim financial institutions listed below, and to obtain any of the monies, funds, credits, assets, and other property owned by and under the custody and control of the victim financial institutions, by means of false and fraudulent pretenses, representations, and promises and material omissions, to wit:

COUNT	APPROXIMATE DATE	DEFENDANT(S)	DESCRIPTION
2	March 5, 2021	TIANNA COSBY	Deposited an altered version of Check 1903, in the amount of approximately \$8,695, at PNC Bank in Clinton, Maryland.
3	May 14, 2021	TIANNA COSBY	Deposited an altered version of Check 2017, in the amount of approximately \$950, at Navy Federal Credit Union in Clinton, Maryland.
4	May 21, 2021	CARTER	Deposited an altered version of Check 590, in the amount of approximately \$800, at Navy Federal Credit Union in Clinton, Maryland.

5	June 15, 2021	TIANNA COSBY	Deposited an altered version of Check 2690, in the amount of approximately \$5,000, at Navy Federal Credit Union in Clinton, Maryland.
6	June 29, 2021	TIANNA COSBY, SISCO, TOMMI COSBY, and CARTER	Deposited, and caused to be deposited, an altered version of Check 3411, in the amount of approximately \$8,912.50, at Navy Federal Credit Union in Clinton, Maryland.
7	May 21, 2021	TIANNA COSBY	Deposited an altered version of Check 11875, in the amount of approximately \$38,802.35, at BB&T Bank in Upper Marlboro, Maryland.
8	June 14, 2021	TIANNA COSBY	Deposited an altered version of Check 492132, in the amount of approximately \$19,104.19, at Navy Federal Credit Union in Clinton, Maryland.
9	June 25, 2021	TIANNA COSBY and ADEDUWON	Deposited, and caused to be deposited, an altered version of Check 73279, in the amount of approximately \$9,000, at BB&T Bank in Upper Marlboro, Maryland.
10	July 4, 2021	TOMMI COSBY	Withdrew approximately \$300 in proceeds from an altered version of Check 2204 at Wells Fargo Bank in Largo, Maryland.
11	July 13, 2021	TIANNA COSBY	Deposited an altered version of Check 116884, in the amount of approximately \$9,586.20, at Navy Federal Credit Union in Clinton, Maryland.

18 U.S.C. § 1344

18 U.S.C. § 2

COUNTS TWELVE THROUGH EIGHTEEN
(Aggravated Identity Theft)

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in Paragraphs 1 through 5 and 7 through 19 of Count One of this Indictment are hereby incorporated by reference.

2. On or about the dates set forth below, in the District of Maryland and elsewhere, the defendant(s) listed below did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, knowing that the means of identification belonged to a real person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is, conspiracy to commit mail fraud and bank fraud, in violation of 18 U.S.C. § 1349, as charged in Count One of this Indictment, and bank fraud, in violation of 18 U.S.C. § 1344, as charged in Counts Two through Eleven of this Indictment, and as set forth below.

COUNT	APPROXIMATE DATE	DEFENDANT(S)	MEANS OF IDENTIFICATION
12	March 5, 2021	TIANNA COSBY	The name, address, and bank account number of Identity Theft Victim #1 on Check 1903 during and in relation to Counts One and Two.
13	May 14, 2021	TIANNA COSBY	The name, address, and bank account number of Identity Theft Victim #2 on Check 2017, during and in relation to Counts One and Three.
14	May 21, 2021	CARTER	The name, address, and bank account number of Identity Theft Victim #3 on Check 590, during and in relation to Counts One and Four.
15	June 15, 2021	TIANNA COSBY	The name, address, and bank account number of Identity Theft Victim #4 on Check 2690, during and in relation to Counts One and Five.

16	June 26, 2021	TIANNA COSBY and SISCO	The name and address of Identity Theft Victim #5 on a photo of Check 3411, during and in relation to Counts One and Six.
17	June 25, 2021	TIANNA COSBY and ADEDUWON	The name, mailing address, bank access card number, and bank PIN of Account Mule #1, during and in relation to Counts One and Nine.
18	June 29, 2021	TIANNA COSBY, TOMMI COSBY, and CARTER	The name, mailing address, online banking information, and bank PIN of Account Mule #2, during and in relation to Counts One and Six.

18 U.S.C. § 1028A(a)(1)

18 U.S.C. § 2

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. §§ 981(a)(1)(C) and 982, 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), in the event of the defendants' conviction on Counts One through Eleven of the Indictment.

Mail Fraud and Bank Fraud Forfeiture

2. Upon conviction of any of the offenses set forth in Count One through Count Eleven, the defendants,

**TIANNA COSBY,
a/k/a "Mendoza,"
MARCHE SISCO,
TOMMI COSBY,
BINIAH CARTER, and
ZION OLUWADEMILADE ADEDUWON,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the scheme to defraud, and, pursuant to 18 U.S.C. § 982(a)(2)(A), any property constituting, or derived from, proceeds obtained directly or indirectly as the result of the scheme to defraud, including, but not limited to, a money judgment for each defendant representing the proceeds she obtained from her participation in the scheme to defraud.

Substitute Assets

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence
- b. has been transferred, sold to, or deposited, with a third party

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property described above, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c).

18 U.S.C. § 981(a)(1)(C)
18 U.S.C. § 982
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)



Erek L. Barron
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

12-7-23
Date